



Kaiser Hill

Rocky Mountain
Remediation Services, L.L.C.
... protecting the environment

FACSIMILE MESSAGE

Rocky Flats Environmental Technology Site
P.O. Box 464
Building T130F
Golden, Colorado 80402-0464
Phone: 303-966-2678
Fax: 303-966-8244

DATE: 8/2/95
TO: Carl Sprang ^{CDPHE} FAX NUMBER: 759-5355
FROM: Steve Hahn ^{Kaiser Hill} FAX NUMBER: 966-8244
TOTAL NO. OF PAGES (including cover sheet): 4 966-9888 EXT

COMMENTS:

Here is a preliminary draft copy
of the closure plan for OUII.
As we discussed, I understand CDPHE
will be placing the ad and opening
the public comment period next week.
Please call me with comments

If you have any problems with this fax, please call (303) 966-2678.

ADMIN RECORD

BZ-A-000495



1/4

**INTERIM STATUS CLOSURE PLAN
FOR
OPERABLE UNIT 11: WEST SPRAY FIELD**

PURPOSE

The intent of this Closure Plan is to provide a description of the closure process for one interim status closure unit at Rocky Flats Environmental Technology Site (Rocky Flats). This plan addresses requirements contained in Colorado Hazardous Waste Act (CHWA) Section 265, Subpart G - Closure and Post-Closure.

Closure of hazardous waste treatment and storage units are to be conducted in accordance with the closure performance standard contained in CHWA Section 265.111. This standard requires the Department of Energy to close these interim status unit in a manner which:

1. Minimizes the need for further maintenance, and
2. Controls, minimizes or eliminates, the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to ground or surface waters or to the atmosphere, and
3. Complies with all other appropriate closure requirements contained in Part 265.

The specific requirements and responsibilities for cleanup activities at Rocky Flats are outlined in the Interagency Agreement (IAG) between the Department of Energy (DOE), the Environmental Protection Agency (EPA) and the Colorado Department of Public Health and Environment (CDPHE). Interim status closure units have been designated in the IAG as Individual Hazardous Substance Sites (IHSSs). One IHSS, IHSS 168, comprises Operable Unit (OU) 11. Guidance from CDPHE and EPA allow for the closure requirements to be satisfied by a Corrective Action Decision/Record of Decision (CAD/ROD) within the integrated RCRA/CERCLA process.

DESCRIPTION OF CLOSURE UNIT

The one interim status closure unit in OU 11 is located within the Rocky Flats buffer zone. The following is a summary of the physical description and operational history of the closure unit:

IHSS 168 - WEST SPRAY FIELD. IHSS 168 is an undeveloped area of approximately 105 acres located in the western Rocky Flats buffer zone. From April 1982 through October 1985, IHSS 168 was used for the periodic spray application of excess liquids from Solar Evaporation Ponds 207-B North and 207-B Center. The source of these liquids were effluents from the Sewage Treatment Plant and ground water collected in the Interceptor Trench System. These liquids contained elevated levels of nitrates, metals, radionuclides, volatile organic compounds and semivolatile organic compounds.

REMOVAL OF HAZARDOUS WASTE INVENTORY

There are and will be no containers of waste in treatment or storage at IHSS 168 during closure; therefore, there is no inventory to be removed.

SAMPLING AND ANALYTICAL METHODS

The methods used to sample and analyze for RCRA hazardous constituents and radiological contamination are described in detail in the Final Phase I RCRA Facility Investigation/Remedial Investigation (RFI/RI) Work Plan and Revised Field Sampling Plan for OU 11. At IHSS 168 three types of samples were collected and analyzed:

1. surficial soil samples for radionuclides, metals and nitrates
2. subsurface geologic materials samples for radionuclides, metal, nitrates, volatile organic compounds and semivolatile organic compounds
3. ground water samples for radionuclides, metal, nitrates, volatile organic compounds and semivolatile organic compounds

RCRA closure is based on the results of the CDPHE Conservative Screen. The CDPHE Conservative Screen results showed that IHSS 168 poses no current or potential threat to human health or the environment.

DECONTAMINATION

The results of the sampling performed at IHSS 168 have been reported in the Combined Phases RFI/RI Report. The report concludes that the IHSS is in compliance with RCRA clean closure performance standards. Therefore, no additional decontamination is necessary.

ADDITIONAL ACTIONS TO ASSURE COMPLIANCE

In accordance with Section I.B.II of the IAG, additional action at IHSS 168 may be required if:

1. There has been a release of hazardous constituents or hazardous substances to the environment external to the IHSS or
2. There is a threat of post-closure escape of hazardous waste, hazardous constituents, run-off, hazardous waste decomposition products, or hazardous substances.

In addition to samples collected from within IHSS 168, sampling was also conducted around the IHSS 168 boundary. The RFI/RI investigation determined that no contamination from wastes stored or treated at the IHSS had migrated out of the IHSS and so no additional actions are necessary in order to satisfy the closure performance standards.

CLOSURE SCHEDULE

The investigation objectives and proposed sampling and analysis methods were submitted as the Final Phase I RFI/RI Work Plan on January 2, 1992; the results of the investigation were submitted as the Final Combined Phases RFI/RI Report on June 9, 1995. The remaining schedule for the closure of IHSS 168 consists of the submittal of the Final CAD/ROD by September 29, 1995.

FINANCIAL ASSURANCE

Federal government facilities are exempt from the financial requirements imposed by Subpart H of CHWA, Section 265.140(c). Because Rocky Flats is a federally-owned facility, no cost estimate or financial assurance documentation is required.

ADDITIONAL INFORMATION

The RFI/RI Work Plan, RFI/RI Report, Proposed Plan and other documents contain data pertinent to the closure of the IHSS 168 and are available at the information repositories at the following locations:

Rocky Flats Public Reading Room
Front Range Community College
Level B
3645 W. 112th Avenue
Westminster CO 80030

Colorado Department of Public
Health and Environment
Hazardous Materials and Waste
Management Division - Bldg. B2
4300 Cherry Creek Drive South
Denver CO 80222-1530

Citizens Advisory Board
9035 N. Wadsworth Parkway
Suite 2250
Westminster CO 80021

Standley Lake Library
8485 Kipling Street
Arvada CO 80005

U.S. Environmental Protection Agency
Superfund Records Center
5th Floor
999 18th Street
Denver CO 80202-2466

4/4